

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: ) Chapter 11

W. R. GRACE & CO., et al.<sup>1</sup> ) Case No. 01-01139 (KJC)

) (Jointly Administered)

Reorganized Debtors. )

**Objection Deadline: January 5, 2015, at 4:00 p.m.**

**Hearing Date: January 21, 2015, at 11:00 a.m.**

**CERTIFICATION OF NO OBJECTION REGARDING MOTION REQUESTING  
ENTRY OF A PROTECTIVE ORDER AUTHORIZING THE REORGANIZED  
DEBTORS TO FILE A JOINT DEFENSE AGREEMENT UNDER SEAL**

**[DOCKET NO. 32471]**

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to *Motion Requesting Entry of a Protective Order Authorizing the Reorganized Debtors to File a Joint Defense Agreement Under Seal* (the “Motion”) filed on December 12, 2014. The undersigned further certifies that he has caused the Court’s docket in this case to be reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Motion, responses to the Motion were to be filed and served no later than January 5, 2015 at 4:00 p.m.

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<sup>1</sup> The Reorganized Debtors comprise W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or “Grace”) and W. R. Grace & Co.-Conn. (“Grace-Conn.”).

It is hereby respectfully requested that the Order attached to the Motion be entered at the Court's earliest convenience.

Dated: January 7, 2015

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